

25. The method according to claim 21, wherein said connection information is a routing telephone number.
26. The system according to claim 22, wherein said connection information is a routing telephone number. --

### REMARKS

Applicants wish to thank to the Examiner for the courtesy extended in the Telephone Interview conducted on May 7, 2002. Applicants respectfully request reconsideration in view of the foregoing amendments to the claims and the following remarks.

### STATUS OF THE CLAIMS

Claims 1-5, 7-15 and 17-22 are pending in this application. Of the pending claims, claims 1, 11, 21 and 22 are independent in form. All of the pending claims have been rejected under 35 U.S.C. §112. By this amendment, claims 21 and 22 have been amended. Claims 23-26 have been added. No new matter has been added by this amendment.

### REJECTIONS UNDER 35 U.S.C §112

In paragraph two (2) of the office action, claims 1-5, 7-15 and 17-22 have been rejected under 35 U.S.C. §112, first paragraph, as containing subject matter which was not described in the specification. Specifically, the Examiner indicated that the language "a connection information" in claims 1, 11, 21 and 22 and "without converting data format" in claims 21 and 22 is not supported by the specification as originally filed.

While Applicants do not necessarily agree with the Examiner as Applicants believe that support for this language can be found in the specification as discussed in the Amendment filed January 11, 2002, claims 21 and 22 have been amended to delete the language "without converting data format", rendering this rejection moot at least as to this

language.

Regarding the use of “a connecting information”, Applicants believe support is found and refer the Examiner’s attention to the paragraph beginning with line 11 of page 7 in the original specification which reads:

Suppose that a caller 2 (Figure 2), for example, desires to be connected to an agent located at call processing center 30. Caller 2 dials the telephone number for call processing center 30 and is connected to a Local Exchange Carrier (LEC) 19. Circuit-switched network 14 queries the database with AANCP 40 for determining the availability of an agent at call processing center 30 through STP 16 using SS7 signaling. In response, AANCP 40 accesses the agent inventory database in Agent Inventory Module 43 (Figure 3) and returns a routing telephone number of a suitable available agent. (Emphasis added. Page 7, lines 11-18 of the original specification)

Applicants believe that at least the underlined portion of the foregoing supports the language “a connection information” as recited in claims 1, 11, 21 and 22, e.g., “a routing telephone number” in the specification may be interpreted as “a connection information”.

Applicants respectfully submit that there is no requirement that specific claim language be identical to language in the specification and direct the Examiner’s attention to 37 C.F.R. §1.75(d)(1) which states as follows:

“The claim or claims must conform to the invention as set forth in the remainder of the specification and the terms and phrases used in the claims must find clear support or antecedent basis in the description so that the meaning of the terms in the claims may be ascertainable by reference to the description.” (Emphasis added)

The rule clearly calls for terms and phrases used in the claims to have clear support or antecedent basis in the description so that the meaning of the terms in the claims may be ascertainable by reference to the description. Applicants submit that the meaning of “a connection information” in claims 1, 11, 21 and 22 may well be ascertained by those of

ordinary skill in the art with reference to the description as stated in the specification as discussed above.

The Examiner expressed the opinion during the telephone conference that the language "connecting information" may be broader than what is stated in the cited portion of the specification and thus is unsupported. This, however, is not a proper reason to reject the claims for use of such language unless prior art can be provided to disclose or suggest "connecting information" as construed consonant with the specification. Applicants respectfully submit that there is no requirement that the language in a claim be limited to a disclosed embodiment or that it cannot be broader than a disclosed embodiment, and that in fact imposing such requirements would be against accepted, established law.

Accordingly, Applicants believe that claims 1 and 11 as pending and claims 21 and 22 as amended are in condition for allowance and such action is respectfully requested.

**New claims 23-26**

During the telephone discussion, the Examiner, with reference to the above cited portion of the specification, indicated that it would likely be acceptable to specifically recite "a routing telephone number". Accordingly, claims 23-26 drawn to this matter have been added. Support for the new claims may be found in the above-cited portion of the original specification, i.e., Page 7, lines 11-18 of the original specification. Applicants believe that the newly added claims are allowable in view of the cited art and such action is respectfully requested.

Applicants have not individually addressed the rejection of the dependent claims because Applicants believe that the foregoing amendments places the independent claims from which they depend in condition for allowance. Applicants, however, reserve the right to

address such rejections of the dependent claims should such be necessary.

**CONCLUSION**

Based on the foregoing, Applicants respectfully request reconsideration and allowance of this application. In the event that a telephone conference would facilitate examination of this application in any way, the Examiner is invited to contact the undersigned at the number provided.

Respectfully submitted,

MORGAN & FINNEGAN

Dated: May 13, 2002

By: 

Stephen J. Manetta  
Registration No. 40,426

CORRESPONDENCE ADDRESS:  
MORGAN & FINNEGAN L.L.P.  
345 Park Avenue  
New York, New York 10154  
(212) 758-4800

**VERSION WITH MARKINGS TO SHOW CHANGES MADE IN THE CLAIMS**

Please amend claims 21 and 22 as follows.

21. (Twice Amended) A method for connecting a call to one agent among a plurality of agents in a call center, the method comprising the steps of:

- (i) receiving a query from one of a plurality of telecommunications networks requesting connection of the call to one agent of the plurality of agents, each telecommunications network being a disparate telecommunications network with respect to other telecommunications networks of the plurality of telecommunications networks, the agent being coupled to each disparate telecommunications network [without converting data format];
- (ii) determining the availability of the plurality of agents where if an agent is not in communication with at least one of the plurality of the telecommunication networks, it is determined available;
- (iii) responding to the query with a connection information of a determined agent; and
- (iv) connecting the call to the determined agent.

22. (Twice Amended) A system comprising:

- (i) at least one agent, among a plurality of agents in a call center, receiving calls from at least two disparate telecommunications networks;
- (ii) a processor coupled to at least one agent among the plurality of agents and to each telecommunications network from which the at least one agent receives calls [without converting data format], the processor configured to:
  - (a) receive a query from one of the at least two disparate telecommunications network regarding whether at least one agent, among the plurality of agents, is available;
  - (b) determine the availability of the plurality of agents based on status whether or not an agent is in communication with one of the at least two disparate telecommunication network; and
  - (c) respond to the query with a connection information of an agent.